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April 12, 2019

Via ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Democratic National Committee v. The Russian Federation, et al.*, 1:18-cv-03501

Dear Judge Koeltl:

I write on behalf of the Democratic National Committee (“DNC”) to request a modification of the number of pages allowed for the response to the six motions to dismiss filed in this matter.¹

On October 1, 2018, the Court issued a Scheduling Order (ECF No. 181) (“Scheduling Order”) in which it set limits on the number of pages permitted for briefing the motions to dismiss. The Scheduling Order provided that Defendants may file an omnibus brief of no more than 50 pages, and that each individual Defendant may file an additional brief of no more than 15 pages, with Defendants Aras and Emin Agalarov allowed 25 pages for their opening brief. *Id.* at 2-3. The Order permits the DNC to respond to the motions to dismiss with briefs totaling an equal number of pages. *See id.* at 2-3.

Together, the Defendants have submitted briefs in support of motions to dismiss totaling 171 pages. The Trump Campaign, Inc. brief (ECF No. 227) was 50 pages, and the lengths of the other Defendants’ briefs were as follows: Aras and Emin Agalarov—25 pages (ECF No. 230);

¹ The Trump Campaign, WikiLeaks and Mssrs. Stone, Kushner, Papadopoulos, and Gates consent to this request. The Agalarovs did not respond to Plaintiff’s request for consent. No other Defendants have counsel listed on the docket.

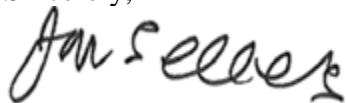
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Jared Kushner—15 pages (ECF No. 222); George Papadopoulos—27 pages (ECF No. 234); Roger J. Stone, Jr.—19 pages (ECF No. 232); and WikiLeaks—35 pages (ECF Nos. 208, 225).² The Russian Federation filed a 10-page, single-spaced Statement of Immunity of the Russian Federation (“Statement of Immunity”) (ECF No. 186). Thus, while the Scheduling Order contemplated that Defendants would submit briefs totaling 135 pages, the briefs submitted by the Defendants, along with the Russian Federation’s Statement of Immunity, total 181 pages.

The DNC therefore asks the Court for leave to submit one or more briefs in response to the motions to dismiss and to the Russian Federation’s Statement of Immunity that collectively total no more than 140 pages.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Sellers", written over a light gray horizontal line.

Joseph M. Sellers

² Defendants Paul J. Manafort, Jr., Donald J. Trump, Jr., and Julian Assange did not move to dismiss the Second Amended Complaint. Richard W. Gates III did not submit a brief in support of his purported motion to dismiss. (*See* ECF No. 223).